

COPY OF DEVELOPMENT PROPOSAL SUBMISSION – DP 562

Cover Note

DP No.	DP 562
School	Bellarena Primary School
Proposal	<i>'Bellarena PS will discontinue with effect from 31 August 2019, or as soon as possible thereafter'</i>
Department's Decision	Approved
Date of Decision	14 March 2019
Permanent Secretary's Comments	<p><i>"I refer to [the] submission to me dated 8 March 2019, and associated papers, about the above Development Proposal.</i></p> <p><i>I am satisfied that this is an issue on which it is appropriate for me to take a decision in the context of the Northern Ireland (Executive Formation and Exercise of Functions) Act 2018.</i></p> <p><i>The proposal is that the school should close. Such proposals are always very difficult, but seem particularly so when they are rural schools that tend to be regarded as important features of local communities, often with strong historical and emotional attachments. I am conscious of the sensitivities involved.</i></p> <p><i>Clearly there are sustainability issues with the school when assessed against the Sustainable Schools Policy. The enrolment number has been on a downward trajectory over time, and the school now has two composite classes spanning four and three year groups respectively. Furthermore, the school has been in Formal Intervention. Notwithstanding a healthy accumulated surplus position, the school does not currently operate within its in-year budget.</i></p> <p><i>The overall demographic projections for the local government district anticipate further slight decreases in the 0-15 years cohort over the next five years. There are four alternative Controlled primary schools, and other primary schools of a different management type, within a ten mile radius (all less than ten miles), all with available places and assessed by the Education and Training Inspectorate as good or better.</i></p> <p><i>The case for change is therefore very compelling. Our overriding concern must be for sustainable, quality educational provision. I am mindful of the Department's obligations in respect of the Rural Needs Act (NI) 2016. In that regard, I note that the Sustainable Schools Policy already reflects rural considerations and that the impact of the closure of the school would be mitigated by home-to-school transport to quality alternative educational provision.</i></p> <p><i>In conclusion, I accept the recommendations set out at paragraph 74 of [the] submission. In doing so, I strongly agree with the comments made by the Controlled Schools' Support Council in its letter of 23 October 2018 that arrangements should be expedited to facilitate the enrolment of displaced pupils to minimise uncertainty and disruption and that the staff involved are supported appropriately</i></p>

Additional Notes	-								
Information redacted	Some information and personal data may have been removed in line with the principles of the Freedom of Information and Data Protection Act.								
	<table> <tr> <th>Key</th><th>Details</th></tr> <tr> <td>■</td><td>redaction</td></tr> <tr> <td>*</td><td>refers to less than five cases where data is considered sensitive</td></tr> <tr> <td>#</td><td>means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure</td></tr> </table>	Key	Details	■	redaction	*	refers to less than five cases where data is considered sensitive	#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure
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#	means figure has been suppressed to prevent disclosure of sensitive information under rules of disclosure								

From: BILL STEVENSON
Area Planning Policy & Shared Education Campuses Team

Date: 8 March 2019

To: Derek Baker
Permanent Secretary

Copy distribution below

DEVELOPMENT PROPOSAL (DP) 562
BELLARENA PRIMARY SCHOOL (PS), LIMA VADY

Issue:	To decide on DP 562: <i>Bellarena PS will discontinue with effect from 31 August 2019, or as soon as possible thereafter.</i>
Timescale:	Routine.
Financial / Resource Implications:	<u>Capital:</u> None. <u>Resource:</u> Teaching and non-teaching staff are afforded employment protection under their respective School Re-organisation Agreements and are eligible for redeployment under transfer redundancy procedures. Staff unsuccessful in gaining redeployment or employment will be treated as supernumerary and a Centre cost. At this stage of the process these costs cannot be determined due to too many variables.
FOI Implications:	The content of this submission is likely to be fully disclosable.
Statutory Duty Implications:	The Rural Needs Act (NI) 2016
Presentational Issues:	It is likely that there will be local media interest in your decision. Should any queries arise the Press Office can refer to this submission and liaise with officials.
Recommendation:	It is recommended that you: (i) Approve DP 562 that:

	<p><i>Bellarena PS will discontinue with effect from 31 August 2019, or as soon as possible thereafter.</i></p> <p>(ii) Agree that this submission (with appropriate redactions) can be made available on the Department's website once the Education Authority (EA) and the school have been notified.</p>
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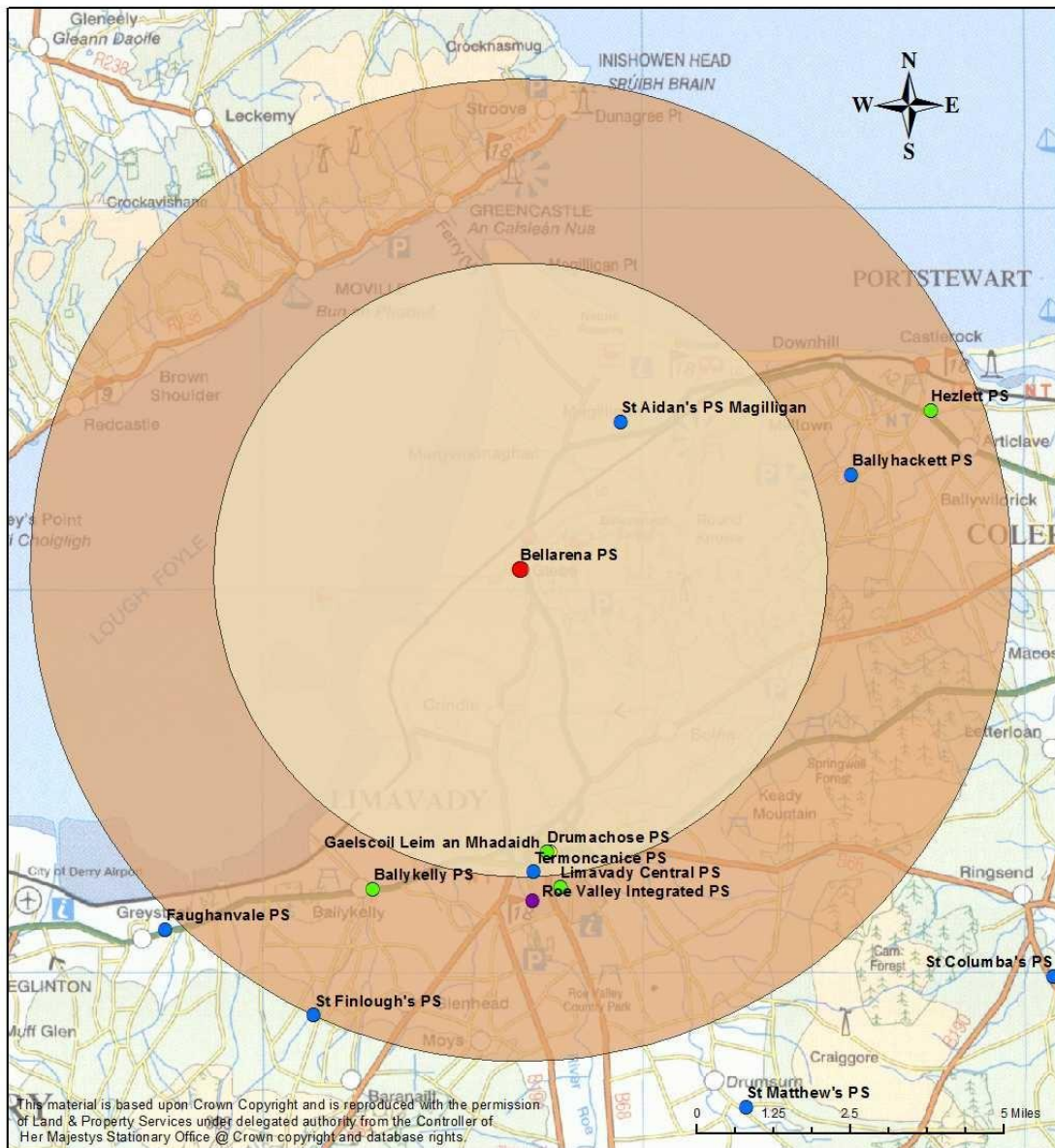
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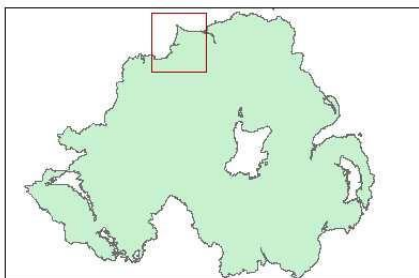
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MAP 1

Bellarena PS - All Provision (8 Mile Radius)

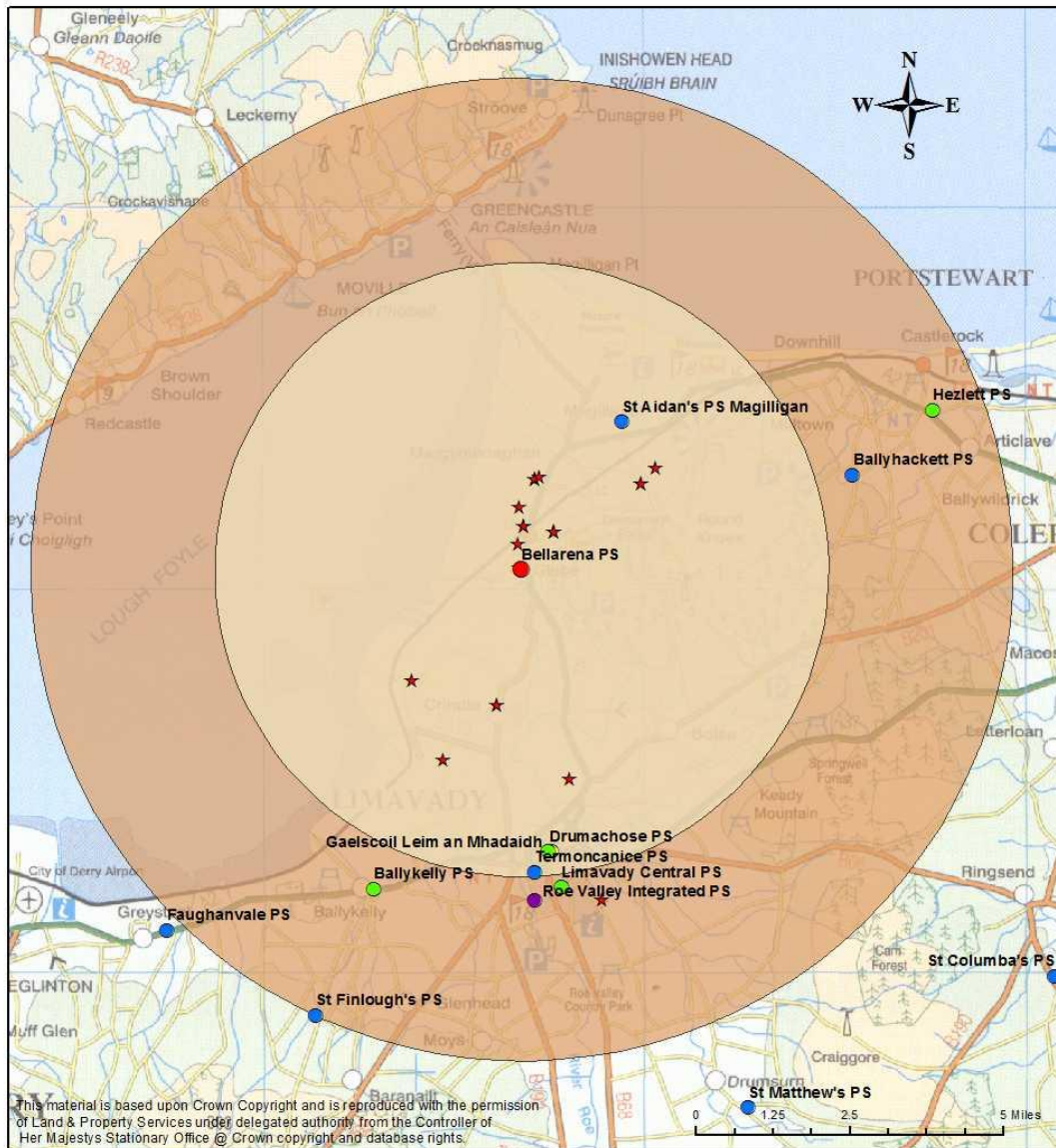


- Bellarena PS
- Controlled
- Maintained
- Other Maintained
- Controlled Integrated
- GMI
- Voluntary
- 5 mile radius of Bellarena PS
- 8 mile radius of Bellarena PS

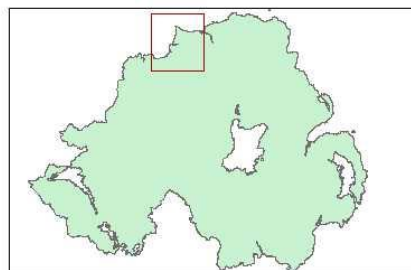


MAP 2

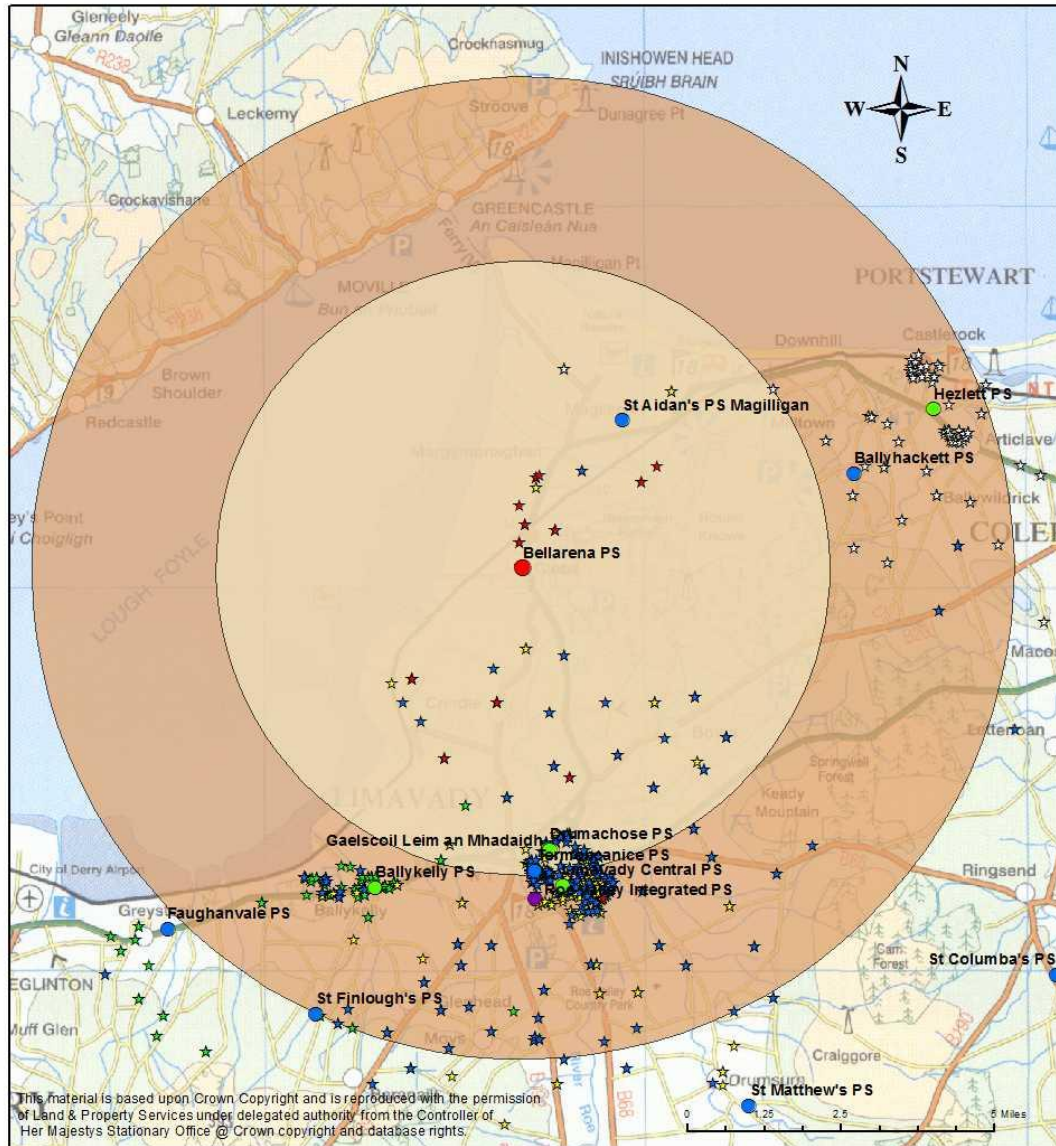
Bellarena PS - Pupil locations (8 Mile Radius)



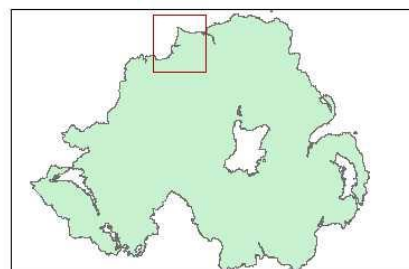
- Bellarena PS
- Controlled
- Maintained
- Other Maintained
- Controlled Integrated
- GMI
- Voluntary
- ★ Bellarena PS - Pupil locations
- 5 mile radius of Bellarena PS
- 8 mile radius of Bellarena PS



Bellarena PS - Controlled Schools Pupil Locations (8 Mile Radius)



- Bellarena PS
- Controlled
- Maintained
- Other Maintained
- Controlled Integrated
- GMI
- Voluntary
- ★ Bellarena PS - Pupil locations
- ★ Drumachose PS - Pupil locations
- ★ Limavady Central PS - Pupil locations
- ★ Ballykelly PS - Pupil locations
- ★ Hezlett PS - Pupil locations selection
- 5 mile radius of Bellarena PS
- 8 mile radius of Bellarena PS



INTRODUCTION

1. On 19 September 2018, the EA published DP 562 proposing to discontinue Bellarena PS with effect from 31 August 2019, or as soon as possible thereafter.
2. The statutory two-month objection period ended on 19 November 2018. A copy of the published DP and the supporting Case for Change are reproduced at Appendices A and B respectively.

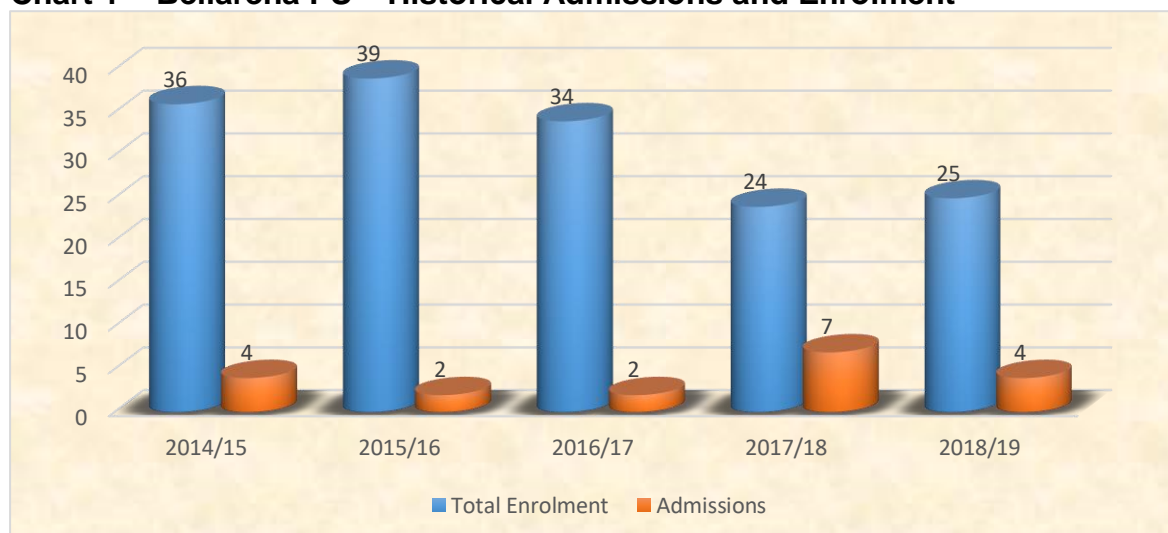
BACKGROUND

3. Bellarena PS is a Controlled, co-educational primary school situated at 260 Seacoast Road in Limavady, illustrated by Map 1.
4. In 2017/18 all pupils enrolled lived within a five mile radius of the school, as illustrated by Map 2.

Admissions and Enrolment

5. The approved admissions and enrolment numbers for Bellarena PS are 11 and 74 respectively. In 2018/19 the school's enrolment of 25 pupils included four pupils admitted to Year 1. There were 49 available places that children could apply for through the competitive admissions process.
6. Chart 1 illustrates the pattern of admissions and enrolment at Bellarena PS, with the school's enrolment in a general pattern of decline since 2014/15. The school has admitted considerably less than its approved enrolment number (11) in each of the last five years, peaking at 7 in 2017/18. The school's overall enrolment of 25 in 2018/19 is significantly below the Sustainable Schools Policy (SSP) minimum recommended enrolment of 105 for a sustainable rural primary school. In 2018/19 11 pupils (44%) at Bellarena PS were entitled to free school meals.

Chart 1 – Bellarena PS – Historical Admissions and Enrolment



Area Context

7. On the Northern Ireland Multiple Deprivation Measure 2017 the Magilligan area, in which Bellarena PS is situated, is placed 491 out of 890 (1 being most deprived and 890 least deprived).

EA's "Providing Pathways" Strategic Area Plan for School Provision 2017-2020

8. The Strategic Area Plan 2017–2020 (the Area Plan) identifies a number of key emerging issues from analysis of current provision in the Causeway Coast and Glens Local Government District (LGD) area. Issues relevant to Bellarena PS are as follows:

- Address school provision where sustainability is an issue.

9. The Area Plan includes population projections provided by the NI Statistics and Research Agency which states that the population within the age range of 0-15 years in the Causeway Coast and Glens LGD is projected to decrease by 1.4% by 2024.

10. Bellarena PS initially featured in the EA's 2017/18 Annual Action Plan which identified a key issue to 'address school provision where sustainability is an issue'. This action was carried forward to the 2018/19 plan which states *"managing authority to consult on options for future provision of Bellarena PS by June 2018"*.

Alternative Primary Provision

11. The maps above illustrate the location of Bellarena PS and the nearest alternative primary provision, including pupil locations. The statistical data set out in the snapshot at Table 1 includes all primary provision within a ten mile radius of the school.

Alternative Controlled Provision

12. While there are no Controlled primary schools within a five mile radius of Bellarena PS, four alternatives exist within ten miles. In 2018/19 overall enrolment at each of these Controlled providers (Drumachose PS; Limavady Central PS; Ballykelly PS; and, Hezlett PS) exceeded the recommended minimum enrolment of 105 for a sustainable rural primary school under the SSP. Also, each school recorded available places within its approved enrolment and each was undersubscribed with first preference applications for 2018/19.

13. It is noted that one of these providers, Ballykelly PS, features in the EA's 2018/19 Action Plan as an action carried forward from the previous plan. While its inclusion has not yet resulted in a published Development Proposal, the EA has stated an intent to *'consult on a decrease to the school's admissions and enrolment number'*. Ballykelly PS is situated some 7.6 miles away from Bellarena PS and recorded 322 available places in 2018/19.

14. Including Ballykelly PS, there are 270 approved Year 1 places across the four alternative Controlled schools and in 2018/19 there were 150 applications for those places, all of which were accepted. Map 3 illustrates limited competition in the catchment areas of Bellarena PS and other Controlled schools, with only a small overlap in catchment between Bellarena PS and the two closest Controlled providers (Drumachose PS and Limavady Central PS) in particular.

15. The quality of education at these alternative Controlled schools has been assessed as good or better by the ETI, although the most recent inspections at both Hezlett PS and Limavady Central PS were hampered by industrial action.

Alternative Catholic Maintained Provision

16. There is one Catholic Maintained primary school within a five mile radius of Bellarena PS, with a further three located within a ten mile radius. Three of these four schools fall below the recommended minimum enrolment of 105 for a sustainable rural primary school under the SSP. In 2018/19 a total of 386 available places were recorded, with the majority of these in Termoncanice PS (330), followed by Ballyhackett PS (34), St Aidan's PS (20), and 2 at St Finlough's PS, Ballykelly.

17. There are 141 approved Y1 places at these schools, with 76 applicants for places admitted in 2018/19.

18. The quality of education provided by each of these schools has been assessed as good or better by the ETI.

19. In 2018/19 Ballyhackett PS enrolled pupils identifying themselves as coming from a Protestant background, and could therefore be an alternative for parents should the DP be approved.

Table 1: Bellarena PS - Snapshot of Alternative Provision

Ref No	School & Postcode	Distance from School - in miles (Google maps - journey by car)	Approved Enrolment Number 2018/19	16/17 Actual Enrolment*	17/18 Actual Enrolment*	18/19 Actual Enrolment*	18/19 Supernumerary	2018/19 Available places	Approved Admissions Number 2018/19	2018/19 Actual Admissions No.*	2019/20 Total 1st Pref. Applications	Variance (over/under subscribed at 1st Preference)	ETI inspection reports – overall assessment
201-2087	Bellarena PS BT49 0JB		74	34	24	25	0	49	11	4	*	Under - 9	Sept 2016 - Significant areas for improvement. Oct.2018 - ASOS
Sub-total			74	34	24	25	0	49	11	4	*		
Controlled													
201-6029	Drumachose PS Limavady, BT49 0BS	5.5	413	318	339	359	6	60	59	54	62	Over - 3	Oct 2017 - High level of capacity for sustained improvement
201-6426	Limavady Central PS BT49 0NB	6.3	595	422	416	377	8	226	85	36	35	Under - 50	May 2014 - Very good Dec. 2018 - ASOS
201-2298	Ballykelly PS BT49 9JS	7.6	586	288	295	278	14	322	84	34	33	Under - 51	March 2013 - Good
301-2229	Hezlett PS Castlerock, BT51 4TZ	8.9	295	237	237	227	8	76	42	26	20	Under - 22	May 2015 - Good June 2018 - ASOS
Sub-total			1889	1265	1287	1241	36	684	270	150	150		
Maintained													
203-3708	St Aidan's PS Magilligan, BT49 0LL	3.4	82	63	67	62	0	20	12	7	11	Under - 1	March 2018 - High level of capacity for sustained improvement
203-2287	Termoncanice PS Limavady, BT49 9BH	5.8	746	476	445	424	8	330	107	57	54	Under - 53	May 2016 - Capacity to identify and bring about improvement
303-2104	Ballyhackett PS Castlerock, BT51 4SR	9.3	67	44	44	36	3	34	10	2	*	Under - 9	Sept 2014 - Good Nov.2018 - ASOS
203-6149	St Finlough's PS Ballykelly, BT49 9JL	10.1	87	79	85	85	0	2	12	10	12	-	Feb 2011 - Very good Nov.2018 - ASOS
Sub-total			982	662	641	607	11	386	141	76	78		
Other Maintained													
204-6689	Gaelscoil Leim an Mhadaidh Limavady, BT49 0BX	5.6	2017/18 - 100 2018/19 - 110	82	92	93	2	19	17	13	19	Over - 2	Nov 2017 - High level of capacity for sustained improvement
Sub-total			2017/18 - 100 2018/19 - 110	82	92	93	2	19	17	13	19		
Integrated													
206-6665	Roe Valley IPS Limavady, BT49 9EX	6.3	174	188	187	198	5	0	25	30	30	Over - 5	May 2010 - Good Jan. 2019 - ASOS
Sub-total			174	188	187	198	5	0	25	30	30		
GRAND TOTAL			2017/18 - 3109 2018/19 - 3119	2231	2231	2164	54	1138	464	273	279		

* The actual enrolment and admissions numbers include statemented pupils, however, exclude reception pupils.

The 1st pref applications do not include reception or statemented pupils. Info. provided by EA - 7.2.2019

SPECIAL CONSIDERATIONS

Rural Considerations

20. Rural proofing has been a requirement for all Government Departments in Northern Ireland since 2002 and has been an integral part of the policy development process. In 2016 the commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016. The Act places a duty on Government Departments to have due regard to rural needs when developing, adopting, implementing or revising policies, strategies and plans and when designing and delivering public services. It came into operation for Government Departments and District Councils on 1 June 2017 and applies to public authorities from 1 June 2018. Bellarena PS has a rural location within the Magilligan area, near Limavady.

CASE FOR CHANGE

21. The Case for Change sets out the EA's rationale for the proposed closure of Bellarena PS as follows:

- The school is historically small and enrolment has not exceeded 40 over the past number of years;
- The school is currently in the Formal Intervention process;
- Bellarena PS operates as a two-teacher school;
- The Annual Action Plan highlights 'sustainability is an issue';
- The school has experienced declining enrolment and currently enrolls only 24 pupils;
- The largest Year Group is Year 1 with 7 pupils, however this is not replicated in the September 2018 intake numbers where only 4 first-preference applications have been received.
- Alternative schools within the area have received good/very good/outstanding ETI reports, can provide for the educational needs of the pupils, are sustainable, and have capacity; and
- It is the view of the EA that this action will contribute to school improvement – children will have better opportunities to engage in education and in after school activities through larger classes and mixing with their peers.

22. The Case for Change is reproduced in full at Appendix B.

STATUTORY DP PROCESSES

Pre-publication Consultation

23. In accordance with Article 14 of the Education and Libraries (NI) Order 1986, the EA has confirmed that parents, staff and the Board of Governors (BoG) of Bellarena PS were forwarded a copy of the proposal and supporting information on 21 March 2018. Comments were also invited from the BoGs and Trustees of schools which might be affected by the proposal on 22 May 2018 to be returned to the EA by 17 July. A total of 15 schools were consulted.

24. There were 19 responses received, all objecting to the proposed closure. This included responses from teaching staff, former staff, parents and governors as well as the Controlled Schools Support Council (CSSC), a local pre-school provider and one political representative.

25. Responses included a number of key themes as follows:

- It is to the detriment of the children of the district;
- It is a unique and special rural school, crucial to the community;
- Negative ETI report focuses on formal administrative and organisational aspects of planning, monitoring and evaluation as well as on roles and responsibilities.
- The proposal fails to take account of the positive aspects of small schools such as exceptional staff commitment, close parental contact, and a nurturing family atmosphere;
- Transport concerns for some families;
- Bellarena PS is the only Controlled school serving the Protestant community in the area;
- The school could/should be considered as Integrated;
- Shared Education options should be explored;
- There is concern about disruption for very young children; and
- Years of speculation about the school's future has negatively impacted enrolment trends.

EA VIEW

26. As the proposer, the EA supports the proposal to discontinue Bellarena PS. In providing comments, the EA addresses some of the recurring themes identified in its consultation, namely:

A Change to Integrated status

While the school's current enrolment appears integrated with 54% Protestant and 46% Catholic/Other, the overall enrolment of 24 pupils is unsustainable in SSP terms and sustainability considerations are integral to the process of transformation to Integrated status. The suggestion that pupils could be transported from Limavady to Bellarena PS to increase numbers would not constitute an area planning solution.

Transport

The Education Authority's transport policy would apply to pupils displaced, with transport provided for entitled pupils.

Shared Education

The Case for Change describes the consideration given to shared education arrangements.

Availability of places at local schools

The Education Authority will, should the proposal be approved, liaise with parents, local schools, managing authorities and the Department of Education to endeavour to ensure that pupils affected by the proposal are accommodated in accordance with current guidance/policies.

27. EA comments are reproduced alongside the Case for Change at Appendix B.

Two Month Statutory Objection Period

28. The EA published DP 562 on 19 September 2018. The statutory two month objection period ended on 19 November 2018. During the objection period the Department received a letter from the Controlled Schools Support Council (CSSC). The CSSC did not wish to formally raise an objection to DP 562 but did make the following points:

- The educational experiences of pupils and the welfare of pupils and staff are paramount;
- Should DP 562 be approved, arrangements should be expedited to facilitate the enrolment of displaced pupils;
- If required, approvals should be granted to enable siblings to attend the same school; and
- Teaching and non-teaching staff should be supported in the process of redeployment and/or voluntary severance in keeping with the School Reorganisation Agreement.

29. The CSSC response is reproduced in full at Appendix D.

EDUCATION TRAINING INSPECTORATE (ETI) COMMENTS

30. The ETI advises that at the time of the last inspection *“the school was not addressing sufficiently the areas for improvement”*.

31. The ETI notes the high standard of alternative primary schools as highlighted by two inspections within the 2017-18 year. The ETI comments that *“if the EA and DE were to close the school, it will be important to ensure the children who transfer to other schools have appropriate transport arrangements in place to accommodate the relocation.”*

32. The full ETI commentary is reproduced at Appendix C.

SUSTAINABILITY ASSESSMENT

33. The SSP sets out six criteria supported by quantitative and qualitative indicators which provide the framework for consideration of a school’s longer-term sustainability. The primary objective of this policy is to ensure that all children and young people get a high quality education in schools that are educationally and financially viable. The following is an assessment of Bellarena PS against the six criteria.

CRITERION 1: Quality Educational Experience

34. ETI carried out an inspection of Bellarena PS in September 2016 and assessed the achievements and standards at the school as 'important areas for improvement'. The ETI assessed the provision for learning as 'requires significant improvement'. Overall, the report stated that the school needed to address urgently the significant areas for improvement in the interest of all the learners, and noted that it would require external support to do so.

35. The ETI Inspection Report noted the quality of arrangements for pastoral care provision as an important area for improvement. While ETI identified positive working relationships between children and staff and an inclusive welcoming ethos, the children have *'no formal mechanisms to express ideas on the life and work of the school.'*

36. Following inspection the school was placed into the *'Formal Intervention Process'* on 24 October 2016 to ensure tailored help and support was available to address the challenges and areas for improvement identified by the inspection process.

37. The Case for Change states that the EA continues to work closely with the school to address the issues identified in the ETI report. The EA has reported progress in improving learning and teaching, noting also that the school has more work to do in addressing many of the issues highlighted by the ETI around leadership and management. The Case for Change notes that Bellarena PS is experiencing a rapid decline in numbers and as a two teacher school, work to address ETI concerns falls heavily on the EA's Education Directorate and the small teaching complement within the school.

Special Educational Needs

38. In 2018/19 there were no pupils enrolled in Bellarena PS with a statement of special educational needs.

Teaching Staff

39. A total of 2.4 full-time equivalent teachers are employed at Bellarena PS. The SSP recommends a minimum of four teachers for a primary school.

Composite Classes

40. 2018/19 statistics show that Bellarena PS operated two composite classes, spanning four (i.e. P1-P4) and three (P5-P7) year groups respectively, as identified in Table 2. The SSP states that there should be no more than two composite year groups in a single classroom at a primary school.

Table 2 – Composite Classes at Bellarena PS in 2018/19

Year Group	P1	P2	P3	P4		P5	P6	P7
Pupils	*	7	*	*		*	*	*
TOTAL	17					8		

41. The Case for Change states that while the quality of education has been classified as 'good' and small classes may have benefits, there are also challenges

for schools and staff in managing composite classes with more than two year groups, and providing opportunities for wider interaction amongst their peer group including engagement in extra-curricular activities and team-based experiences.

CRITERION 2: Stable Enrolment Trends

42. Bellarena PS has an approved enrolment number of 74. Table 3 sets out the school's enrolment across the last five years, and shows that the school has been historically undersubscribed. Enrolments have been in a general pattern of decline from 36 in 2014/15 to 25 in 2018/19, and remain substantially below the recommended minimum recommended enrolment of 105 for a sustainable rural primary school, as set out in the SSP.

Table 3 – Bellarena PS – Historical Enrolments (Approved 74)

2014/15	2015/16	2016/17	2017/18	2018/19
36	39	34	24	25

43. The school has an approved admissions number of 11. Table 4 sets out the school's P1 intakes from 2014/15 to 2018/19 and shows that actual admissions remain consistently below the school's approved admissions number.

Table 4 – Bellarena PS - P1 intakes (Approved 11)

2014/15	2015/16	2016/17	2017/18	2018/19
4	2	2	7	4

44. For the 2019/20 academic year the EA has indicated that Bellarena PS received just ■ first preference applications at the close of the applications process.

CRITERION 3: Sound Financial Position

45. At 31 March 2018 Bellarena PS recorded a cumulative 2017/18 budget surplus of £91,753.

46. The school received a total delegated budget of £143,971 in the 2018/19 financial year for their 24 pupils, representing a per capita figure of £5,999. This compares to an average for all primary schools of £2,978. The school's delegated budget included maximum Small School Support funding of £45,183 and a further £16,420 for Principal Release Time.

47. The Case for Change notes the prudent financial management at the school and the operation of a surplus budget position. However, the school does not currently operate within its in-year budget and as a school's enrolment declines it becomes more challenging to live within the budget allocation.

48. Should DP 562 be approved, any surplus held by the school would be absorbed by Education Authority Centre Funds.

CRITERION 4: Strong Leadership and Management

49. The ETI Inspection Report of September 2016 stated that the leadership and management of the school '*requires urgent improvement*'. The report advises that there were no formal systems in place to monitor and evaluate the provision for learning; children's learning experiences; or standards achieved. There was neither a school development plan nor action plans in place at time of inspection, and the report considered that school leaders did not have a clear oversight of priorities for school development and continuing improvement.

50. One of the areas of improvement highlighted in the ETI report is to clarify leadership roles and responsibilities at all levels and to strengthen the governance arrangements at the school.

CRITERION 5: Accessibility

51. Map 2 shows the home location of 2017/18 pupils enrolled. The majority of Bellarena's pupils come from the surrounding rural area and from within a five mile radius of the school. There are no Controlled schools within the immediate vicinity of Bellarena PS, however four alternative Controlled primary schools are available within a ten mile radius. The map illustrates there is a small overlap in catchment areas between Bellarena PS, Drumachose PS, and Limavady Central PS in particular.

CRITERION 6: Strong Links with the Community

52. The ETI Inspection report of September 2016 states that respondents to confidential questionnaires had "praised the principal and the staff for their commitment to the school and the children". In addition, the report indicated that a Parent Teacher Association was in place and was developing further links with parents, encouraging them to become more involved in the life and work of the school.

53. The Case for Change states that the school maintains links with the community, but also notes that it is not frequently used by the local community for activities or after-school activities.

Sustainability Summary

54. The school's historical enrolment has been significantly below the SSP's recommended minimum enrolment of 105 for a sustainable rural primary school and has declined to just 25 pupils in 2018/19. The school operates with two composite classes with more than two year groups and less than the recommended four teachers for a sustainable primary school. Leadership and management at the school was assessed by ETI as requiring urgent improvement in 2016.

55. While the school recorded a budget surplus at March 2018, is accessible to its pupils and maintains links with the local community, the ETI commented on the

sustainability of the school by stating that it will be “*important that the employing authority, school Governors and the staff plan for, and manage, issues related to the sustainability of the school provision and school budget, in order to address the current and future needs of the children and the staff*”.

56. It is evident that Bellarena PS has a number of deficiencies when assessed against the SSP criteria.

ASSESSMENT OF SPECIAL CONSIDERATIONS

Rural Considerations

57. The Rural Development Council’s (RDC) Striking the Balance report highlights the importance of rural proofing so that regard is given to the impact of a particular policy on rural populations (in comparison to those living in urban areas) and to help identify adjustments which might be made to reflect rural needs and ensure that services are accessible to rural communities on a fair basis. A central concern is the quality of education provided to pupils.

58. The SSP policy was assessed against the RDC rural proofing checklist (Striking the Balance, Annex 1) and no adverse impact was identified. The SSP recognises the needs of rural communities and this is reflected in the lower enrolment threshold for rural primary schools, the accessibility criterion which provides guidance on home to school travel times and the criterion strong links with the community also recognises the central place a school has for many communities (rural and urban).

59. The Government’s commitment to rural proofing was strengthened with the introduction of the Rural Needs Act (NI) 2016 (“The Act”). The Act requires public authorities to have ‘due regard’ to consciously consider the needs of people in rural areas when developing policies, strategies and plans and when designing and delivering public services. It defines ‘rural needs’ as “the social and economic needs of rural areas”.

60. The Case for Change acknowledges the potential impact of closing the school on the local rural area, and considers that the provision of home-to-school transport to suitable alternative schools with places available will mitigate this impact.

OTHER CONSIDERATIONS

Financial Implications

61. The Case for Change states that closure would result in an operational saving in terms of recurrent costs associated with running the school, offset by any increase in transportation costs.

Transport

62. The Case for Change states that most of the pupils attending Bellarena PS live within close proximity to the school and are not therefore in receipt of home-to-school transport. In the event of closure, parents of children who fulfil the criteria

stated in the EA's transport policy will become eligible for transport assistance to suitable alternative schools.

Staffing

63. The Case for Change does not quantify the impact closure would have on staffing. Teaching staff are afforded protection as part of the TNC School Reorganisation Agreement for a period of two years.

64. Redundancy costs will apply to those staff availing of voluntary redundancy at the point of closure, together with those teachers who have been unsuccessful in securing employment in the transfer redundancy trawl. Those teachers not gaining employment or who are unsuccessful as part of the transfer redundancy trawl will be treated as supernumerary during the two year protection period.

65. For non-teaching staff the JNC Collective Agreement for school reorganisations affords one year protection and is reviewed annually. The same scenarios regarding redeployment (for one year) as outlined above are applicable to non-teaching staff.

66. In recent years the Department has secured funding for teaching and non-teaching Voluntary Exit Schemes (VES) from the Public Sector Transformation Fund (PSTF) to fund voluntary redundancy costs across the education sector under the Department's Strategic Cost Reduction Programme (SCRIP), however, this source of funding ceases in 2018/19.

67. Consequently a funding pressure of £22m exists and it is not possible at this point to clarify whether this can be met in full, and if only met in part, then redundancy applications would have to be prioritised. In that scenario a school closure would be treated as first priority and voluntary exits would be funded from the Department's Resource budget.

CONCLUSION

68. The SSP, implemented through Area Planning, is clear that the core issue for a school's sustainability must be the continuing provision of a high quality education for children. Generally, it is acknowledged that as numbers in a school decline, the challenges it must overcome in order to provide a high quality education rise.

69. The SSP states that ideally a primary school should have at least seven classrooms (one for each year group), no more than two composite year groups in a single classroom and a minimum of four teachers. Statistics confirm that in 2018/19 Bellarena PS operated two composite classes – one consisting of four year groups; one with three; with only 2.4 full-time equivalent teachers employed.

70. Inspection evidence shows that within a composite class of two year groups, it is possible for all children to be catered for effectively and make good progress. There is no evidence from school inspections to suggest that children taught in composite classes of two year groups are disadvantaged in any way. However, additional factors need to be considered when the composite class

spans more than two year groups. Under these circumstances, ensuring adequate progression in learning and planning to meet the individual needs of children across a wider ability range and stage of development can be more challenging for the teacher. There are also issues relating to opportunities for the children to develop socially and emotionally with children of a similar age, gender and stage of development. The Case for Change states that if DP 562 is approved, “*the larger schools will enhance the learning experience of pupils in the provision of after school activities and having class sizes to facilitate participation both in school and inter-school activities*”.

71. In 2018/19 Bellarena PS had a total enrolment of 25 pupils. The school’s enrolment has been in gradual decline and with only two applications for 2019/20 will remain so. While the school has recorded a budget surplus position, the Case for Change notes that it does not currently operate within its in-year budget. A school with an enrolment of 25 pupils would typically face severe sustainability pressures from both an educational and financial perspective.

72. An ETI report has also assessed the provision for learning as ‘*requiring significant improvement*’ and stated that the school needs to address urgently the significant areas for improvement in the interest of all the learners, noting that it requires external support to do so. As a result, the school has remained in the Formal Intervention process since October 2016, and at the time of the last follow-up visit the school had not sufficiently addressed areas for improvement. The EA continues to work with the school to address these issues, but progress is inhibited by the decline in pupil numbers and the school operating as a two teacher school. Overall effectiveness is therefore an ongoing concern.

73. The closure of any school is a difficult decision, however, the evidence supporting DP 562 appears compelling, with alternative and accessible provision of good quality available for pupils currently attending the school.

RECOMMENDATION

74. Based on the evidence detailed above, it is recommended that you:

- (i) Approve DP 562 that:

Bellarena PS will discontinue with effect from 31 August 2019, or as soon as possible thereafter.

- (ii) Agree that this submission (with appropriate redactions) can be made available on the Department’s website once the Education Authority and the school have been notified.

75. The following appendices are attached for your consideration:

Appendix A: Copy of Development Proposal 562
Appendix B: Case for Change
Appendix C: ETI Comments

Appendix D: Statutory DP Processes
Appendix E: DE (Policy Team) Comments

BILL STEVENSON

Ext: 59310

Email: bill.stevenson@education-ni.gov.uk

cc: (by email)
Fiona Hepper
Lianne Patterson
Noelle Buick
John Smith
Janis Scallon
Eamonn Broderick
APPT Correspondence
Press Office

APPENDIX A

EDUCATION AUTHORITY

DEVELOPMENT PROPOSAL NO 562

BELLARENA PRIMARY SCHOOL

Notice is hereby given that a proposal under Article 14 of the Education and Libraries (NI) Order 1986 has been submitted by the Education Authority to the effect that:

Bellarena Primary School will discontinue with effect from 31 August 2019, or as soon as possible thereafter.

A copy of the Proposal and Case for Change may be inspected at offices of the Education Authority, 1 Hospital Road, Omagh, BT79 0AW, between the hours of 9.00 am and 4.30 pm and www.eani.org.uk (Schools).

Any objections or support to this Proposal should be lodged with the Area Planning Policy Team, Department of Education, Rathgael House, Balloo Road, Bangor, Co Down, BT19 7PR or emailed to dps@education-ni.gov.uk within two months of the date of publication of this notice. Any letters of objection or support may be published on the Department of Education's website, with appropriate redactions, if they are included in full in the submission on which the outcome of the proposal is decided.

The Department of Education and the Education Authority operate a regime of openness under the Freedom of Information Act. Letters of objection and information supplied to the Department of Education and the Education Authority may be subject to disclosure under the Freedom of Information Act, if requested. (A fee may be charged for supplying this information).

Gavin Boyd
Chief Executive

CASE for CHANGE – Supporting Information**SUMMARY/OVERVIEW**

AREA PLANNING DISTRICT	Causeway Coast and Glens
DP NUMBER	562
PROPOSER	John Collings Director of Education Education Authority
SCHOOL(S) NAME	Bellarena Primary School
SCHOOL REFERENCE	201-2087
TYPE	Primary
MANAGEMENT	Controlled
DP PUBLICATION DATE	Week commencing 17 September 2018
PROPOSAL	To discontinue Bellarena Primary School with effect from 31 August 2019, or as soon as possible thereafter

STATUTORY CONSULTATION


Note: It may be necessary for documentary evidence to be provided to show that the statutory procedures have been followed. It is essential that relevant parties retain this information.

The following is to be completed by the Proposer and signed off by them.

EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

<p>PROPOSER</p> <p>Provide detail of consultation with the BOGs, teachers and parents of the affected school(s) – dates of meetings/letters. Good practice suggests all staff (including non-teaching) should be consulted as well as pupils.</p> <p>Summary and assessment of views received – how were these taken into account before publication of the DP?</p>	<p>The Education Authority undertook consultation with:</p> <p>Staff: Monday 21 May 2018 - 3.45pm Board of Governors: Monday 21 May 2018 - 6.00pm Parents/Guardians: Monday 21 May 2018 - 7.00pm Local Schools (15): Letter – Monday 22 May 2018</p> <p>A pre-publication consultation questionnaire was distributed and available on the Education Authority's website for the period 22 May–17 July 2018. In total 19 responses were received. The information below provides a summary/emerging themes of the responses received.</p> <table border="1" data-bbox="576 864 1385 1144"> <thead> <tr> <th></th> <th>Agree</th> <th>Disagree</th> <th>Total</th> </tr> </thead> <tbody> <tr> <td>Board of Governors</td> <td></td> <td>1</td> <td>1</td> </tr> <tr> <td>Staff – Teaching</td> <td></td> <td>1</td> <td>1</td> </tr> <tr> <td>Staff – Non-Teaching</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Parents/Guardians</td> <td></td> <td>13</td> <td>13</td> </tr> <tr> <td>Other (political representative, pre-school provider, Controlled Schools' Support Council and former staff member)</td> <td></td> <td>4</td> <td>4</td> </tr> </tbody> </table> <ul style="list-style-type: none"> Strongly opposed as it is to the detriment of the children of the district. It is a rural school at the heart of the community. Unique and very special rural school that is a crucial part of our community. Would like the school considered as an Integrated school as it is already integrated but in name. Fails to take account of the positive aspects of small schools such as exceptional staff commitment, close parental contact, nurturing family atmosphere and hold rural communities together. While not operating within the in-year budget the school has carry over savings. The ETI report is largely perceived as negative. These negative aspects focused on formal administrative and organisational aspects with planning, monitoring and evaluation as well as clarification of roles and responsibilities as issues. The reality of a two teacher school is that a teaching principal and all staff put the need of the children ahead of formal paperwork. It seems unrealistic to expect the same depth of formal administration in this situation. Pupils are from the surrounding area. Concerns about the transport arrangements – unaccompanied young children and parents will only 		Agree	Disagree	Total	Board of Governors		1	1	Staff – Teaching		1	1	Staff – Non-Teaching				Parents/Guardians		13	13	Other (political representative, pre-school provider, Controlled Schools' Support Council and former staff member)		4	4
	Agree	Disagree	Total																						
Board of Governors		1	1																						
Staff – Teaching		1	1																						
Staff – Non-Teaching																									
Parents/Guardians		13	13																						
Other (political representative, pre-school provider, Controlled Schools' Support Council and former staff member)		4	4																						



	<p>receive transport to their nearest school but this may not be the parents' choice.</p> <ul style="list-style-type: none"> • School organises cross community events throughout the year. • Bellarena PS is the only controlled school serving the protestant community in the area. • Approaches have been made to NICIE with a view to officially applying to become an integrated school. • Option to transport pupils from Limavady to Bellarena. • Concern over the limited number of places available in Roe Valley Integrated School. • Children attending the school are happy, confident and educated to a high standard, going forward to succeed academically. • Could virtual learning be used to resolve the issues of no more than two year groups in one class. • Cause extreme stress and excessive travel for very young children. • Consider shared education. • The years of speculation around the future of the school has negatively impacted on the enrolment trends. • Concern over psychological and physical wellbeing of children if forced to relocate to other school <p>During the consultations undertaken with governors, staff and parents/guardians recurring themes emerged:</p> <p><i>Change school status to Integrated</i></p> <p>While the school current enrolment represents 54% Protestant with 46% Catholic/Other showing an integrated pupil population, the enrolment of 24 pupils falls well below the Sustainable Schools Policy. In any change of status of a school to integrated, the Sustainable Schools Policy applies. The suggestion of pupils being transported from Limavady to Bellarena PS to increase numbers would not provide for an area planning solution.</p> <p><i>Transport concerns</i></p> <p>The Education Authority's transport policy would be applied to pupils displaced with transport provided for pupils with entitlement.</p> <p><i>Shared Education</i></p> <p>The Case for Change outlines consideration of shared education.</p> <p><i>Availability of places in local schools</i></p> <p>The Education Authority will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department of Education to endeavour to ensure that pupils affected by the proposal be accommodated, where possible and within current guidance/policies.</p>
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	<p>Section 75 - Comments from Questionnaires</p> <ul style="list-style-type: none"> • Discrimination against the rural Protestant community. • Discrimination against mixed religion homes. • Stressful for children of such a young age to be asked to travel a distance. • Will put stress on family life and other siblings.
CONFIRMATION BY THE PROPOSER	<p>I confirm that the school(s) BOGs, Staff and Parents of pupils were consulted on 21 May 2018 and Equality Screening of the proposal has been carried out.</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 13 September 2018</p>

ASSOCIATED PROPOSALS

DP XXX Published DD/MM/YY	N/A
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The following is to be completed and signed off by the EA.
EDUCATION AUTHORITY COMMENTARY ON PRE-PUBLICATION STATUTORY CONSULTATION

THE EDUCATION AUTHORITY	<p>I confirm that the schools which the EA consider might be impacted by this proposal were consulted on 22 May 2018.</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 13 September 2018</p>
<p>Provide detail of consultation with schools that may, in the EA's opinion, be affected by the proposal - list of schools, dates of letters issued to schools/meetings.</p> <p>Summary of views received (number of responses, recurring themes, petitions, community support or opposition).</p> <hr/> <p>Responses/Assurances in respect of issues raised during consultation.</p> <hr/> <p>Dates of EA meetings e.g. Education Committee/ Board etc.</p> <hr/> <p><u>Details of issues raised by members of EA Board</u></p>	<p>In accordance with Article 14 of the Education and Libraries (Northern Ireland) Order 1986, a copy of the proposal was sent on 22 May 2018, to schools which, in the opinion of the Authority, might be affected by the proposal. A total of 15 local schools which might be affected by the proposal were forwarded correspondence. Comments were invited from the Boards of Governors and Trustees, to be returned to the Education Authority by 17 July 2018. No responses from local schools were received.</p> <p>This development proposal was discussed by the EA's Education Committee at its meeting on 13 September 2018.</p>
<p>EDUCATION AUTHORITY COMMENTS</p> <p>In the context of planning on an area basis - what is the EA's view of the proposal, taking into account any pre-publication consultation. Does the EA support the proposal?</p> <p>NAME: John Collings</p> <p>OFFICE HELD: Director of Education</p> <p>SIGNED: </p> <p>DATE: 13 September 2018</p>	<p>The Education Authority, as the proposer, supports Development Proposal No 562 to discontinue Bellarena Primary School with effect from 1 September 2019, or as soon as possible thereafter.</p> <p>The proposal to discontinue Bellarena Primary School is being taken forward as detailed in the attached Case for Change.</p> <p>Consultations were undertaken with governors, staff and parents/guardians outlining the Education Authority's Case for Change detailing the rationale for the proposal. During the consultations</p>

	<p>undertaken with governors, staff and parents/guardians recurring themes emerged:</p> <p><i>Change school status to Integrated</i> While the school current enrolment represents 54% Protestant with 46% Catholic/Other showing an integrated pupil population, the enrolment of 24 pupils falls well below the Sustainable Schools Policy. In any change of status of a school to integrated, the Sustainable Schools Policy applies. The suggestion of pupils being transported from Limavady to Bellarena PS to increase numbers would not provide for an area planning solution.</p> <p><i>Transport concerns</i> The Education Authority's transport policy would be applied to pupils displaced with transport provided for pupils with entitlement.</p> <p><i>Shared Education</i> The Case for Change outlines consideration of shared education.</p> <p><i>Availability of places in local schools</i> The Education Authority will, should the proposal be approved, liaise with the parents, local schools, managing authorities and the Department of Education to endeavour to ensure that pupils affected by the proposal be accommodated, where possible and within current guidance/policies.</p> <p>In consideration of the above, and the Case for Change, the Education Authority is proposing to publish Development Proposal No 562 during the week commencing 17 September 2018.</p>
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1 BACKGROUND

Bellarena Primary School is a controlled primary school situated in the Magilligan area, near the town of Limavady. The school is situated in a picturesque setting on the Seacoast Road. The school has an approved enrolment of 74 pupils and an admissions number of 11.

Over the past number of years the school has experienced a downturn in enrolment numbers. Table 1, below, shows the historical and current enrolment figures.

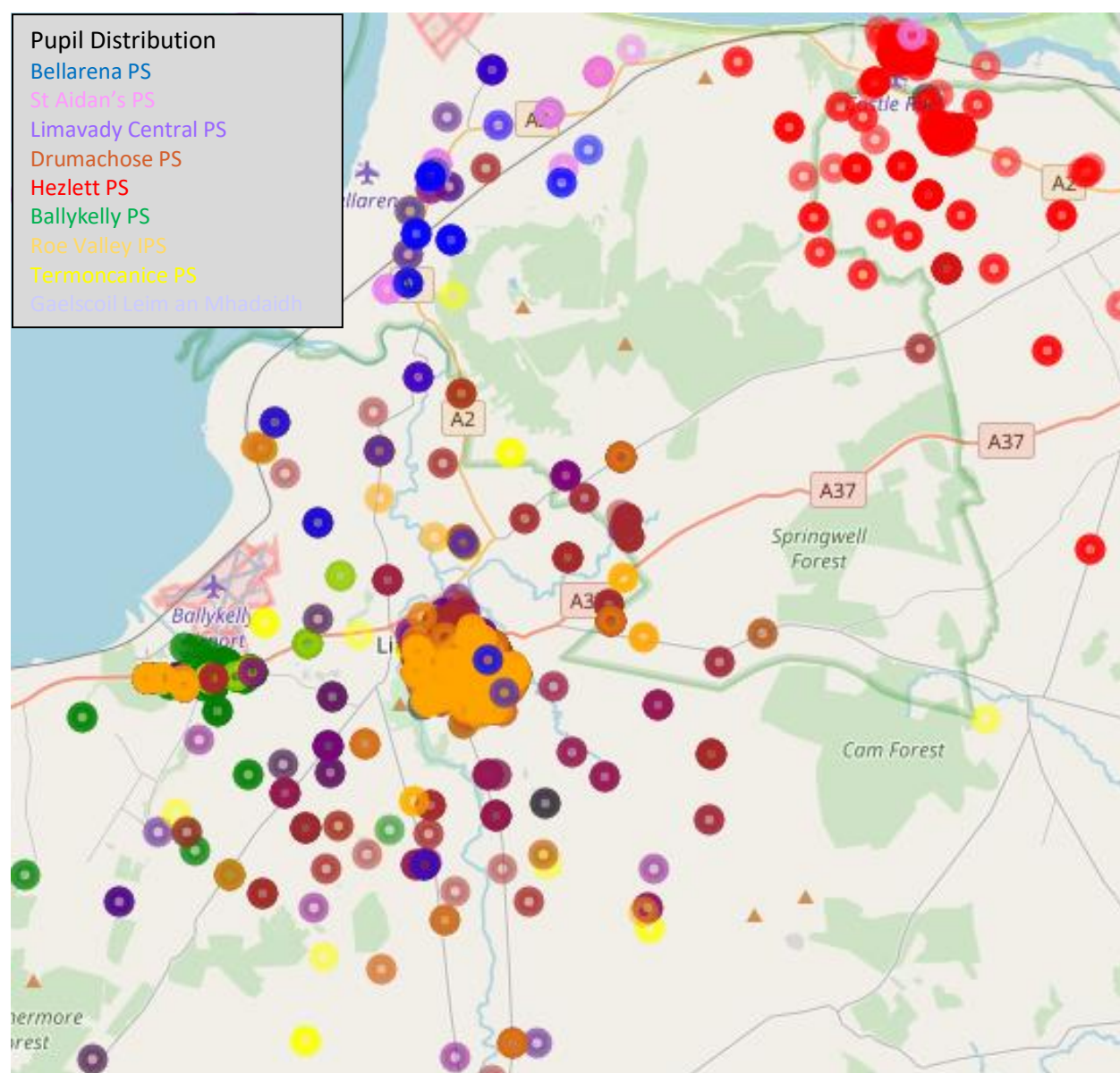
Table 1: Enrolment Statistics								
	Year 1	Year 2	Year 3	Year 4	Year 5	Year 6	Year 7	Total
2007/08	5	9	5	2	9	3	7	40
2008/09	7	5	9	4	0	6	3	34
2009/10	3	7	5	9	4	0	6	34
2010/11	6	4	7	5	8	4	1	35
2011/12	5	6	4	7	5	8	4	39
2012/13	3	5	6	4	7	5	8	38
2013/14	6	3	5	6	5	8	5	38
2014/15	4	4	4	5	6	5	8	36
2015/16	2	4	5	6	6	11	5	39
2016/17	2	2	3	5	6	6	10	34
2017/18	7	2	2	1	4	4	4	24
2018/19	4	7	2	2	1	4	4	24

The enrolment statistics show that while the school has remained steady from 2007 to 2015, the last two years has shown a downturn in enrolment, particularly at September 2017. The school currently has an enrolment of 24 pupils with the largest year group being Year 1 intake in September 2017. However, this increase will not be experienced in September 2018. Year 1 intake at September 2018 is 4 pupils resulting in a September 2018 enrolment of 24 pupils.

Table 2, below, shows the schools closest to Bellarena PS. The distribution map below shows in context the pupil distribution and the local schools. The map highlights that pupils are currently passing Bellarena PS and accessing local schools, in particular in Limavady. There is currently capacity within the local schools as detailed in Table 2.

Table 2: Local Schools - Distance from Bellarena PS					
	Distance (miles) From Bellarena PS	Sector	Enrolment 2017/18	Approved Enrolment 2017/18	Unfilled Places 2017/18
St Aidan's PS, Magilligan	0.9	Maintained	67	82	15
Drumachose PS	5.5	Controlled	339	413	74
Limavady Central PS	6.3	Controlled	416	595	179
Hezlett PS	8.6	Controlled	246	295	49
Ballykelly PS	7.6	Controlled	295	586	291
Termoncanice PS	5.8	Maintained	445	746	301
Roe Valley Integrated PS	6.3	Integrated	187	174	-13
Gaelscoil Leim an Mhadaidh	5.5	Irish Medium	92	100	8

The distribution map below show the pupil distribution for Bellarena PS and the nearest schools



In consideration of the distance of the local schools, home-to-school transport arrangement will be implemented within transport regulations.

2 SUSTAINABILITY ASSESSMENT

The main focus of the Area Planning process is embedded in the Sustainable Schools Policy first published in 2009 and applies to primary and post-primary schools. The policy outlines the criteria that school managing authorities should consider when making decisions affecting the best use of resources in order to deliver an excellent education to children and young people. The policy sets out 6 sustainability criteria, and associated indicators, which are identified as the key references for assessing existing and future education provision to ensure it adequately meets the needs of pupils.

2.1 Quality of Education

Bellarena PS is a controlled primary school situated in the Magilligan area, near the town of Limavady. Almost all of the children attending the school come from the surrounding rural area. The enrolment has remained low over the last three years.

An ETI inspection was undertaken in September 2016. The overall findings of the inspection placed Bellarena PS in formal intervention with the inspection assessment as:

Overall effectiveness	Address urgently the significant areas for improvement
Achievements and standards	Important areas for improvement
Provision for learning	Requires significant improvement
Leadership and management	Requires urgent improvement

The ETI report indicated:

'Achievements and standards

The standards the children attain in mathematics have important areas for improvement. There is variation in the learning experiences and progress the children make in all aspects of mathematics across the key stages. In almost all classes, the children have a good understanding of number facts but have limited opportunities to apply their mathematical understanding in meaningful contexts, in planned problem-solving and investigative work. The children in the foundation stage can work in small groups on purposeful and practical numeracy-based tasks.

The children's thinking skills and personal capabilities are underdeveloped. There are limited opportunities for the children to take responsibility for their learning, manage their work and engage actively and purposefully with their peers. Most of the children engage readily, however, in the individual learning tasks set for them by their teachers and their behaviour is consistently good.

Provision for learning

The provision for learning requires significant improvement. The medium-term planning lacks sufficient detail to guide the learning and teaching across the school; it does not support effectively the development of the children's skills and capabilities in all areas of the Northern Ireland Curriculum. Across the school, the use of information and communication technology (ICT) to support learning is underdeveloped.

The quality of learning and teaching during the inspection was good in most of the lessons observed. In the most effective lessons: the intended learning was clear; the teachers built effectively on the children's previous learning and there were opportunities for the children to engage in practical learning activities. The teachers mark the children's work regularly. There is, however, variation in the quality of the marking to promote improvement and there are no opportunities for the children to engage in self- or peer-assessment. The quality of the individual education plans is inconsistent across the key stages; although in the foundation stage and key stage 1, the individual education plans are effective in guiding the additional support that the children require to support their learning. In all of the lessons observed, there were good working relationships at all levels and the classroom assistants supported the children effectively with their learning.

The quality of the provision for numeracy requires significant improvement. The teachers' planning in numeracy lacks sufficient detail to meet effectively the needs of all of the children and ensure continuous progression in their learning across all areas of the mathematics curriculum. There is an over-emphasis on de-contextualised number work, which is guided

primarily by commercial text books. Consequently, there are insufficient opportunities for the children to develop their mathematical thinking and understanding of mathematical processes in problem-solving activities.

The quality of the pastoral care provision is an important area for improvement. There are positive working relationships between the children and the staff and there is an inclusive welcoming ethos. The children have no formal mechanisms to express their ideas on the life and work of the school.

Overall effectiveness

Bellarena Primary School needs to address urgently the significant areas for improvement in the interest of all the learners. It requires external support to do so.

The areas for improvement are to:

- develop an understanding of, and establish a process of school development planning which includes more formal and effective lines of communication and consultation at all levels and meets the necessary statutory requirements;*
- establish accountable, rigorous and effective monitoring and evaluation strategies to lead and guide the staff in planning to meet the needs of all of the children and whole-school improvement;*
- develop effective, formal administrative and organisational procedures to guide the work of the school; and*
- clarify leadership roles and responsibilities at all levels and strengthen the governance of the school.'*

The EA has and continues to work with the school to address the issues identified in the ETI report and to improve the learning and teaching at the school. The Education Directorate of the EA reports that while there is progress in improving learning and teaching, the school has much more work to do to address the issues in the ETI report particularly around leadership and management. With the school experiencing a rapid decline in numbers in 2017 and the school being a two teacher school, the work to address the ETI report falls heavily on the EA Education Directorate and the two teaching staff within the school.

2.2 Stable Enrolment Trends

Bellarena PS has, as detailed in Table 1, experienced a downturn in pupil numbers over the past number of years. The current enrolment is 24 pupils with Years 3, 4 and 5 having less than 4 pupils. The school's enrolment falls well short of the Sustainable Schools Policy criteria for a rural school, 105 pupils. In addition there are more than two year groups within a classroom as the school operates as a two teacher school.

2.3 Sound Financial Position

Bellarena PS operates a surplus budget position. Over the years there has been prudent financial management with the 2016/17 outturn statement showing a surplus of approximately £100,000 carry over. However, it should be noted that Bellarena PS currently does not operate within its in-year budget.

2.4 Strong Leadership and Management

The ETI report in September 2016 stated that the leadership and management of the school requires urgent improvement. The EA is working with the school to improve leadership and management. However, this will have an impact on the learning and teaching within the school. One of the areas of improvement highlighted in the ETI report is to clarify leadership roles and responsibilities at all levels and strengthen the governance of the school.

2.5 Accessibility

The school can be accessed by car and bus. Access by foot is on a very busy road. The majority of pupils attending the school are from the local area.

2.6 Strong Links with the Community

The school has links with the community. However, the school is not frequently used by the local community for activities or after school activities. The school does run events at Halloween and Christmas which are well attended by all the community.

3 AREA PLANNING IMPACT

The proposal aligns with the key themes of Area Planning. The Area Plan for Northern Ireland aims to ensure that all pupils have access to a broad and balanced curriculum that meets their needs in sustainable schools within a diverse system of education. It sets out the key priorities and objectives in providing access to a network of sustainable schools for the Education Authority, Council for Catholic Maintained Schools and other sectoral bodies in the light of Department of Education policy, in particular the need to raise standards and close the attainment gap through a network of sustainable schools. The focus of the plan is on the educational best interests of children and young people.

Since 2011, statutory planning authorities and school managing authorities have been engaged in implementing the objectives of the Sustainable Schools Policy through Area Planning. The first four objectives are:

- ensure that the excellent quality of education available to some young people is made available to all, in both urban and rural settings, in accessible, modern, fit-for-purpose accommodation;
- improve outcomes for all but, in particular, to provide additional support to those who require it, including those children with special educational needs, to realise their full potential;
- encourage schools to co-operate in sharing best practice to support children with special educational needs and those with other barriers to learning;
- sustain strong, successful and viable schools, well-led by their governors representing local stakeholders, principals and their staff, to be the centre of the education system, supported by effective administrative and strategic direction;

In consideration of the objectives of Providing Pathways Strategic Area Plan for School Provision 2017-2020, the Local Area Working Group identified Bellarena PS as a school to be included within the Annual Action Plan for Primary, Post-Primary and Special Schools April 2017 – March 2018. Bellarena PS was identified under key issue as 'address school provision where sustainability is an issue' with the action 'Managing authority to consult on options for future provision of Bellarena PS by March 2018'.

In taking forward the Annual Action Plan for 2017/18, EA Officers met with the Governors of Bellarena PS to discuss the issues impacting on the school and put forward a number of options for consideration. Appendix A details the options considered.

The EA recommended option is to discontinue Bellarena PS with effect from 31 August 2019, or as soon as possible thereafter and to take the option forward through the development proposal process. Within the area there are no active development proposals.

RATIONALE FOR PROPOSAL

Bellarena PS has always been a small primary school with an enrolment over the past number of years not exceeding 40 pupils. The school was identified in formal intervention operating as a two teacher school and was, in the Annual Action Plan 2017/18, identified as a school provision where 'sustainability is an issue' with the action 'Managing authority to consult on options for future provision of Bellarena PS by March 2018'.

In September 2017, the school experienced a downturn from 34 pupils to 24 pupils. The largest Year group being year 1 with 7 pupils. However, this increase is not replicated in the September 2018 intake numbers with the school receiving 4 first preference applications. This will result in the school having 24 pupils in September 2018. The discontinuance of the school will result in the reduction of 23 pupils in the local area.

Rural Needs Act (NI) 2016 places a statutory duty on the EA to have due regard to rural needs when: developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services. The areas from which Bellarena PS attracts pupils is, according to the Inter-Departmental Urban-Rural Definition Group, defined as rural. The discontinuance of Bellarena PS will have an impact on the local area. The provision of home-to-school transport will provide for the safe transportation of pupils from the area to their nearest school.

EDUCATIONAL IMPACT

The proposal would provide for the education needs of pupils in the area. Bellarena PS is currently in formal intervention with the school and EA working to improve the educational provision at the school. However, with a declining enrolment and a two teacher school, this places pressure on the staff at the school.

The schools within the area received good/very good/outstanding ETI reports and can provide for the educational needs of the pupils of the area. In all of the local schools there currently is capacity. The local schools have pupil numbers which meet the Sustainable School Policy of no more than two year groups in a classroom. The larger schools will enhance the learning experience of pupils in the provision of after school activities and having class sizes to facilitate participation both in school and inter school activities eg, football teams, quiz teams.

The pupils from Bellarena PS who have special educational requirements will continue to have these needs met within the local schools and supported through the EA's Children and Young People's Service.

6 IMPLEMENTATION PLAN (IF THE PROPOSAL IS APPROVED)

The proposal is being brought forward under Article 14 of the Education and Libraries (NI) Order 1986. The implementation date for the proposal is for 31 August 2019, or as soon as possible thereafter. The timetable, pending approval from the Education Committee, for the consultation process is:

Discontinue Bellarena Primary School	Proposed Timescale
Consultation with Governors, Staff, Parents (8 weeks)	17 May 2018–12 July 2018
Consultation with other affected Schools (8 weeks)	17 May 2018–12 July 2018
Education Committee to seek Approval to Publish	13 September 2018
Statutory Objection Period (2 months)	18 September 2018–18 November 2018
Await Ministerial/DE Decision	December 2018/January 2019

7 RESOURCE IMPLICATIONS

The proposal is for the discontinuance of Bellarena PS. As there are currently unfilled places within the local schools, there will be no requirement for additional accommodation to facilitate the relocation of pupils. There will be a cost saving in the recurrent costs of operating a school. This saving will be offset by the increase in transportation costs.

<i>Finance</i>	The operation cost of Bellarena PS will be a cost saving from this proposal.
<i>Staffing</i>	The teaching staff is afforded employment protection under the School Re-organisation Agreement 2013/2 for two years. The non-teaching staff will be afforded employment protection for one year. The EA will meet with staff to discuss options should the development proposal be approved and an action plan implemented for the discontinuance of the school.
<i>Transport</i>	Most of the pupils attending Bellarena PS live within close proximity to the school and do not receive home-to-school transport. The discontinuance of Bellarena PS would require the provision of home-to-school transport. Communication with the EA transport service is ongoing. Any transport arrangement will be in accordance with transport regulations and identified preference school.
<i>Accommodation</i>	No additional accommodation requirements will be required.

Appendix A

Bellarena PS

The Providing Pathways Strategic Area Plan for School Provision 2017-2020 Annual Action Plan for Primary, Post-Primary and Special Schools April 2017 – March 2018 identified a key issue for Bellarena PS as ‘address school provision where sustainability is an issue’ with the action ‘Managing authority to consult on options for future provision of Bellarena PS by March 2018’. As a result the EA engaged with the Board of Governors of Bellarena PS. Engagement discussions focused on the current position of the school and sustainable options for the school. Discussion focused on five options:

1 Do Nothing

This option would result in no change to the current provision. In consideration of the Annual Action Plan, the downturn in enrolment numbers, the ETI report and the school's financial position, do nothing is not an option.

2 Shared Education

The Bellarena/Magilligan area currently has two schools, Bellarena PS a controlled school and St Aidan's PS, Magilligan a catholic maintained school. While the schools are within close proximity the schools to date have not jointly entered into shared education.

The sharing with schools is inhibited as Bellarena PS is a two teacher school. On shared curriculum days with another school, this leaves only one teacher left in Bellarena PS to meet the educational needs of not only their Key Stage class but also the remaining pupils eg if the shared curriculum is for Year 6 pupils, then the educational needs of Years 4, 5 and 7 pupils need to be met by the Key Stage 1 teacher.

As the EA has a duty to encourage, facilitate and promote shared education the EA discussed with CCMS the potential for sustainable shared education within the area. In discussions with EA and CCMS, sharing is usually initiated by the schools through the various shared programmes over the past 20 years. It would be difficult as the schools have no history of sharing. In consideration of the small number of pupils in Bellarena PS and the school being a two teacher school, sharing would be difficult to manage on a day-to-day basis. St Aidan's PS, Magilligan currently has 63 pupils. The two schools together would not make a sustainable school.

Given the circumstances which Bellarena PS currently finds itself, two teacher school, formal intervention, low numbers and no current sharing with the local school, this does not provide an environment which would provide for a sustainable shared educational solution for the school.

3 Federation

A federation would involve local schools coming together either through a soft federation or hard federation. A soft federation which would provide each school with its own governing body, own budget, with representatives on a joint committee. The schools would share common goals, joint committee recommendations but would be up to the individual governing bodies to authorise decisions/plans. A hard federation would provide for a single governing body with common goals and while each school would receive individual budgets these could be used to pool budgets across the schools in the federation. In considering a federation, the sustainability of a federated school within the local area would not provide for a sustainable provision.

4 Amalgamation

As with the options above, sustainability is an issue. The area is served by two schools, Bellarena PS and St Aidan's PS, Magilligan. An amalgamation of both schools would not provide for a sustainable school.

5 Discontinue

In considering the future of Bellarena PS, all of the options for the school did not provide a sustainable provision for the school. In discussions with the Board of Governors, there was disappointment that the work of the governors could not provide a sustainable solution for the school. Over the past number of years, the governor membership has changed and the current governors, while working with the EA to improve the learning and teaching at the school and the lack of pupils has resulted in governors facing an increasingly difficult task. The EA notes the large budgetary surplus which the school currently experiences, however, the educational provision of pupils is the primary focus of the EA. Governors put forward proposals to promote the school, however, September 2018 intake and current enrolment trends have not provided any upturn in numbers. The EA recognises the commitment of the governors but the current circumstances would not provide for the curricular provision of pupils currently attending Bellarena PS.

In consideration of the options above, the EA recommends that Bellarena PS discontinues with effect from 31 August 2019.

ETI Development Proposal Commentary Paper

Date of last ETI report: October 2016

Web link: <https://www.etini.gov.uk/publications/primary-inspection-bellarena-primary-school-limavady-county-londonderry>

1. Update on relevant/contextual information since the last published inspection report.

An interim follow-up visit was conducted on 24 September 2017 to monitor the progress being made in bringing about the necessary improvements. At this point, enrolment had dropped further to 24 children.

The school is currently in the follow-up inspection process (FIP).

2. Knowledge of **any contextual information on the quality of education** in the wider local area.

During the year 2017-18, two primary schools within and around the 5 mile radius of Bellarena PS were inspected; both were evaluated as having a high level of capacity for sustained improvement in the interest of all the learners.

3. Potential benefits/concerns associated with the claims of **educational** benefits for pupils made in the Case for Change.

The ETI report Oct 2016 states that the provision for learning requires significant improvement.

If the EA and DE were to close the school, it will be important to ensure the children who transfer to other schools have appropriate transport arrangements in place to accommodate the relocation.

4. Any concerns about the **implementation date or phasing of implementation** should this be applicable (i.e. curricular, EF, accommodation, LSCs, etc).

N/A

5. The **SSP Criteria** indicators requiring ETI input (if known and/or for which information is available).

Sustainable Schools Criterion	Indicator	Meets criterion		
		Yes	No (include reason(s))	Information not available
Quality Educational Experience	1.1 Attainment levels of pupils, Key Stage tests pending development of new indicators for Primary Schools, GCSE results for Post-Primary Schools.	Work in progress.	ETI report Oct 2016: standards attained are an important area for improvement.	
	1.2 No more than <u>two</u> composite year groups in a single classroom at primary school level.	No	Only two classes: P1 – P4 in one class and P5 – P7 in the other class.	
	1.3 A <u>minimum</u> of four teachers at a primary school. This recognises both the needs of pupils and the demands on teachers.	No	One teaching principal and one assistant teacher.	
	1.4 The ability of the school to cater for children with Special Educational Needs.	Work in progress during the FUI process.	ETI report Oct 2016: the quality of the individual education plans is inconsistent across the key stages.	
	1.5 The ability at post-primary level to be able to provide suitable access to the entitlement framework including, where appropriate, linkages with other schools, the FE sector or other providers.	N/A		
	1.6 The standards and the quality of learning and teaching at the school.	Work in progress during the FUI process	ETI report Oct 2016: the provision for learning requires significant improvement. ETI IFUV Sept 2017: the school needs to develop further a shared understanding of planning for learning and evaluating learning in order to meet better the needs of all children, raise further the standards attained and improve the quality of the teaching.	
	1.7 The range of curricular and extra-curricular activities available for children including career guidance, physical education, music, art, drama and science.			✓

	1.8 The quality of the <u>physical</u> environment for learning and teaching i.e. the condition, energy and water efficiency and suitability of the buildings.			✓
	1.9 The quality of, and arrangements for, pastoral care including the active promotion of the principles of social justice in all areas of the formal and informal curriculum.	No	ETI report Oct 2016: the quality of the pastoral care provision is an important area for improvement. There are positive working relationships between the children and the staff and there is an inclusive welcoming ethos. The children have no formal mechanisms to express their ideas on the life and work of the school.	
Strong Leadership and Management by Boards of Governors and Principals	4.1 Governors' views on the school based on quantitative and qualitative evidence.			
	4.8 There is a school development plan in place and progress is being made to achieve the plan's aims and objectives.	Work in progress.	IFUV Sept 2017: there is now a draft school development plan that follows broadly the statutory regulations. The associated action plans do not contain sufficient child-centred and measurable targets that include the more effective use of qualitative and quantitative data. However, at the time of the IFUV, the process of monitoring and evaluating has not begun and the outworking of the planning for improvement and capacity building is not yet apparent. The school needs to increase the pace of change in order to address the areas for improvement.	
	4.9 Pupil behaviour, expulsions, suspensions and non-attendance as well as positive behaviours such as involvement in school management (e.g. buddying and mentoring schemes).		The children have limited involvement in school management.	
Strong links with the Community	6.1 Degree and quality of parental involvement (schools will be asked to provide evidence on this).	No	Stated during IFUV Sept 2017: there are no curriculum meetings with parents.	
	6.3 Contribution of the school to the community (schools will be asked to provide evidence on this).			✓
	6.4 Presence of other features of provision, e.g. nursery or specialist unit.	No		

6. Overall conclusion of impact of the proposal

At the time of the ETI interim follow-up visit (IFUIV) in September 2017, the school was not addressing sufficiently the areas for improvement.

APPENDIX D

Statutory Two Month Objection Period

The Department received one response during the statutory two month objection period, reproduced below:



Controlled Schools' Support Council
2nd floor, Main Building
Stranmillis University College
Belfast, BT9 5DY
T: 028 9531 3030
E info@csscni.org.uk

23 October 2018

RE: Development proposal no 562 Ballarena Primary School

Dear sir/madam

CSSC Response

The Controlled Schools' Support Council (CSSC) notes the Education Authority's proposal to discontinue provision at Bellarena Primary School. CSSC has consulted with Bellarena Primary School and other controlled schools in the area.

CSSC does not wish to raise an objection in respect of development proposal 562. In all aspects of the consultation CSSC would request that the educational experiences of pupils and the welfare of pupils and staff are paramount.

Should a decision be taken to approve this proposal CSSC would seek assurance that arrangements will be expedited to facilitate the enrolment of displaced pupils to minimise uncertainty and avoid disruption to their education. CSSC would also request that, if required, approvals are granted to enable siblings to attend the same school. CSSC would also wish to ensure that staff, both teaching and non-teaching, are supported in the process of redeployment and/or voluntary severance in keeping with the School Reorganisation Agreement.

Yours sincerely

Barry Mulholland
Chief Executive

DE (POLICY TEAM) COMMENTS

A: SCHOOL ADMISSIONS TEAM

Development Proposal (DP) 562 proposes that Bellarena PS will discontinue with effect from 31 August 2019, or as soon as possible thereafter.

Rationale for the DP

The Case for Change (CfC) notes that Bellarena PS has always been a small primary school with an enrolment over the past number of years not exceeding 40 pupils. The school was identified in formal intervention operating as a two teacher school and was, in the Annual Action Plan 2017/18, identified as a school provision where 'sustainability is an issue' with the action 'Managing authority to consult on options for future provision of Bellarena PS by March 2018.'

Approved Admissions/Enrolment Numbers and Actual Admissions/Enrolment numbers

School Year	Approved Admissions Number	Approved Enrolment Number	Actual Admissions Number	Actual Enrolment Number
2013/14	11-13	74	6	38
2014/15	11-13	74	4	36
2015/16	11-13	74	2	39
2016/17	11-13	74	2	34
2017/18	11-13	74	7	24
2018/19	11-13	74	4	24

School Admissions/Temporary Variations

If a school receives more applications for admission than it has places available it can request a Temporary Variation (TV) of its admissions and/or enrolment number from the Department. The Department may approve TVs to a school's numbers to respond to particular demographic pressures in an area in a particular year. Bellarena PS has been consistently undersubscribed for several years in both its admissions and enrolment numbers and therefore TVs have not been requested or required.

In the event of Bellarena PS closing, the Department will consider granting TVs to facilitate the affected children transferring to other schools in the area. **However, no advance guarantee of approval can be provided as the Department will consider what other provision is available in an area at the point of application.** The Department will approve a TV to a school's numbers for children who otherwise do not have a primary school of the same type, with places, available to them within a reasonable travelling distance of the child's home address. For primary school TVs reasonable distance is defined as a distance of 2

miles. Any TV request made can only be considered from the requesting school (not from parent/s) and a TV is granted on the condition that no additional accommodation will be required.

Page 7 of the CfC shows the schools closest to Bellarena PS. There is current capacity within the local schools as below, with the exception of Roe Valley PS which is oversubscribed for admission:

School	Approved Admissions	Approved Enrolment	2017/18 Enrolment	2018/19 Admissions
St Aidan's PS	12-14	82	67	7
Drumachose PS	59-64	413	339	49
Limavady Central	85-90	595	416	36
Hezlett PS	42-46	295	246	21
Ballykelly PS	84-89	586	322	34
Termoncanice PS	107-112	746	497	59
Roe Valley PS	25-28	192	187	30 (TV)
Gaelscoil Leim an Mhadaidh	17-20	110	92	13

Conclusion

Ultimately, the long term need for places in particular areas is for the area planning process to consider. SAT does not hold data on future demand for places and is unable to make a recommendation on whether the DP should be approved.

B: EDUCATION WORKFORCE DIRECTORATE

EWD has reviewed the Case for Change and noted the potential for staffing implications for teaching and non-teaching staff as highlighted at Section 7, Page 14.

Assurance should be sought from the Education Authority that any potential impact on terms and conditions of teaching and non-teaching staff are managed in accordance with the following policies:

- **TNC 2013/2** –School Reorganisation Agreement and DE Circular 2013/7 - School Reorganisation Allowances: a teacher who suffers a reduction in pay as a result of staff reorganisation or redeployment may be eligible to apply for a school reorganisation allowance;
- **TNC 2010/1** – Procedure for Handling Teacher Redundancy: will apply where a teacher is considered, or wishes to be considered, for redundancy;
- **TNC 2011/8** – Workload Agreement: should the Case for Change result in an increase to enrolment in a school, or surrounding schools, assurance should be provided regarding how potential impact on teacher workload, as a result of increased class size, will be managed;
- **JNC 224** – Collective Agreement for School Reorganisations – Employment protection for Support Staff will apply where the Case for Change may impact on the terms and conditions of non-teaching staff.

C: ACCESS & WELLBEING DIRECTORATE

It is noted from the case for change:

“The pupils from Bellarena PS who have special educational requirements will continue to have these needs met within the local schools and supported through the EA’s Children and Young People’s Service.”

From a special educational needs (SEN) policy perspective, therefore, SET would have no objections to the DP, subject to the assurance that any impact on pupils with SEN will be considered and managed effectively, in particular:

- Continued support for SEN pupils following the closure, and assistance for pupils, as required, in managing the change to a new setting;
- Continued appropriate placement for SEN pupils with a statement of special educational needs; and assistance for these pupils in managing the change to a new setting;
- Consideration, as necessary, of the facilities and equipment required to support pupils with SEN within the new setting.

D: FINANCIAL MONITORING TEAM INPUT

Enrolment:	<u>2018-19</u>	24 in years 1-7
	<u>2017-18</u>	34 in years 1-7
	<u>2016-17</u>	39 in years 1-7
Staffing:	<u>2018-19</u>	Principal & 1.40 Staff
	<u>2017-18</u>	Principal & 1.00 Staff
	<u>2016-17</u>	Principal & 1.00 Staff
FSME:	<u>2018-19</u>	11 pupils – 45.83% - Band 3
	<u>2017-18</u>	15 pupils – 44.12% - Band 2
	<u>2016-17</u>	19 pupils – 48.72% - Band 3
Total School’s Delegated funding Allocation:		£143,971 in 2018/19 (CFF Allocation)
		£170,573 in 2017/18 (CFF Allocation)
		£183,822 in 2016/17 (CFF Allocation)

Small Schools Support Funding - **£45,183** (maximum funding allowed);
Primary Principals’ Release time Funding - **£16,420** (maximum funding allowed).

Per Capitas:	<u>2018-19</u>	£5,999 for school – Phase Average £2,978
	<u>2017-18</u>	£5,017 for school – Phase Average £3,001
	<u>2016-17</u>	£4,713 for school – Phase Average £3,069
Surplus:		£91,753 at the end of 2017/18
Surplus:		£102,694 at the end of 2016/17
Surplus:		£94,276 at the end of 2015/16
Parliamentary Constituency:		East Londonderry

E: CHILDREN'S & YOUNG PEOPLE'S SERVICES

The EA has given due consideration to the transport requirements for pupils in their Case for Change. Given the small number of pupils who may be dispersed to surrounding nearby schools, any financial implications for school transport would be nominal.

F: CURRICULUM, QUALIFICATIONS & STANDARDS DIRECTORATE

No issues/concerns have been identified, from a policy perspective, in respect of the development proposal by any of the CQSD policy teams.

G: SHARED EDUCATION & COMMUNITY RELATIONS TEAM

The EA, in the Case for Change document, does give consideration to Shared Education in the context of the Development Proposal, complying with its duty under Article 6 of the Shared Education Act (Northern Ireland) 2016.

Bellarena PS is not engaged in a Shared Education partnership. However, other local Primary schools are engaged in Shared Education partnerships through either CASE or SESP. The single response to the consultation (from CSSC) made no reference to Shared Education. Hence no evidence has been presented to indicate that the proposal would be either beneficial or detrimental to progressing Shared Education.

H: CORPORATE SERVICES DIRECTORATE

On behalf of Corporate Services I have considered the proposal and I have noted the following comments made during the consultation:

- Discrimination against the rural Protestant community;
- Discrimination against mixed religion homes;
- Stressful for children of such a young age to be asked to travel a distance; and
- Will put stress on family life and other siblings.

Also the following in the Case for Change document:

- "The pupils from Bellarena PS who have special educational requirements will continue to have these needs met within the local schools and supported through the EA's Children and Young People's Service"; and
- "Rural Needs Act (NI) 2016 places a statutory duty on the EA to have due regard to rural needs when: developing, adopting, implementing or revising policies, strategies and plans, and designing and delivering public services. The areas from which Bellarena PS attracts pupils is, according to the Inter-Departmental Urban-Rural Definition Group, defined as rural. The discontinuance of Bellarena PS will have an impact on the local area. The provision of home-to-school transport will provide for the safe transportation of pupils from the area to their nearest school".

I have also considered the option assessment in the Case for Change document and the EA recommendation that Bellarena PS discontinues with effect from 31 August 2019.

The comment from an equality perspective would be to suggest that particular support may be of value for the pupils affected by the closure (in order that any adverse impact of the transition can be lessened).